

REMARKS

Claims 1-22 are pending in the application, with claims 13-22 being withdrawn subject to a restriction requirement. Reconsideration of the objections and rejections is hereby respectfully requested in view of the above amendments and the following remarks.

Claims 1-10 and 12 stand rejected under 35 U.S.C. 102(b) as being anticipated by Schneider (DE 197 17 511 A1). This rejection is respectfully but strenuously traversed and reconsideration and a withdrawal of the rejection is hereby respectfully requested. The Examiner contends that Schneider discloses a conveyorized a horizontal processing line for wet processing the work piece comprising at least one respective transport member (citing to rollers visible in the fixed figures) which the Examiner contends extend in a horizontal direction of transport, and also includes at least one processing facility (bath 1) which forms one structural component (transport und fuhrungselemente-items 2) above the conveying path, and at least one adjusting device (motor 5) to raise and lower a structural component.

Applicant's invention is not anticipated by, nor is it obvious in view of, the cited Schneider reference. Applicant's invention, as set forth in the claims, recites a novel conveyorized processing line which is not taught, suggested or disclosed by Schneider. In order to properly consider the Applicant's invention, it must be appreciated that claim 1 recites not only the processing facility which forms one structural component of the Applicant's claimed conveyorized horizontal processing line, but also at least one

transport member. Both the processing facility and the at least one respective transport member are recited and claimed as the Applicant's invention in each of the claims.

Schneider fails to disclose the features of the Applicant's claimed invention. Even if one considers bath 1 of Schneider to be a processing facility, there is no suggestion to have this processing facility (e.g., bath 1) forming a structural component together with the transport member. Applicant's invention recites that the

conveyorized horizontal processing line for wet-processing a workpiece (2) having the following facilities: (a) *at least one respective transport member* (3; 12,18) for the workpiece (2) located above and beneath a conveying path (100)... [and] (b) *at least one processing facility* (6) for the workpiece (2) which is disposed above the conveying path (100) *and forms, together with the at least one transport member* (3), *one structural component* above the conveying path (100)...

In addition to the failure of Schneider to disclose or suggest the Applicant's claimed processing facility forming a structural component together with the transport member, Schneider also fails to disclose raising or lowering such structural component in a substantially vertical direction and/or pivoting the same. In accordance with the Examiner's attempted characterization, this would afford having bath (1) of Schneider and the items (2) of Schneider be moved altogether and, for such movement to be affected, bath 1 and the items 2 would need to be integrated into one and the same integral construction. Schneider does not disclose such integral construction. The Applicant's claimed invention is not disclosed or suggested by Schneider and should be patentable.

Further, the Examiner asserts that motor 5 of Schneider would be the at least one adjusting device as claimed which would be configured in such a manner that the

structural component may be raised or lowered in a substantially vertical direction and or be pivoted. However, Schneider must be considered for what it actually and fairly discloses. Motor 5 of Schneider, simply serves the drive of the items 2 (see fig. 1 of Schneider), that does not serve such raising or lowering and/or pivoting of items 2.

Figure 1 of Schneider also does not show how the motor 5 acts on the items 2. Applicant notes the corresponding text passage in this specification to describe figure 1 of

Schneider states as follows:

“Die Transport- und Führungselemente 2 sind durch nicht dargestellte Antriebselemente, wie zum Beispiel Achsen und Zahnräder, so miteinander verbunden, daß sie von einem Motor 5 gemeinsam angetrieben werden.” (col. 2, lines 8-11)

“The transport and guiding elements 2 are connected together by drive elements such as for example axis and gearwheels (not shown here) in such a way that they are conjointly driven by a motor 5”

Thus motor 5, does not, unlike the Applicant's claimed invention which calls for at least one adjusting device, serve the raising or lowering and/or pivoting of the transport members, but rather the drive thereof. Applicant's claim recites this feature:

the at least one adjusting device (4; 9, 10; 5, 26) being configured in such a manner that the structural component may be raised or lowered in a substantially vertical direction and/or may be pivoted.

Motor 5 of Schneider is neither configured to serve the raising or lowering and/or pivoting of the transport members. Even considering item 10 in Figure 2 of Schneider, what is shown is a pulsating wheel which serves the measurement of the rotation of the motor transmission to the wheels in order to sense the PCB forwarding in the processing line. This item again does not represent any of the members used according to claim 1 of

the Applicant's present invention, and thus does not teach or disclose the claimed invention.

Applicant's present invention claims features which Schneider fails to suggest or disclose. The features of the Applicant's claimed processing line are appreciated when considering the carrying frame 4 (Fig. 1 of the present application) which carries both the processing facility 6 (a flow nozzle for example) and the transport members 3 (transport rollers for example), further by motors (which are not shown in Fig. 1) which drive eccentrics for the height adjustment of carrying frames 4 via carrying members 26. This claimed structure and arrangement is completely different than the construction of the apparatus disclosed by Schneider. Accordingly, for the reasons set forth above, Applicant's present invention, as recited in the pending claims is not disclosed by Schneider, nor is it taught or suggested thereby. Reconsideration and a withdrawal of the Examiner's 102(b) rejection of claims 1-10 and 12 with respect to Schneider is hereby respectfully requested.

Claims 1-12 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Schneider in view of U.S. 6,261,425 ("Huang"). This rejection is respectfully but strenuously traversed and reconsideration and a withdrawal of the rejection are hereby respectfully requested.

Applicant's present invention is not obvious in view of the cited references and should be patentable. First, for the reasons set forth above, Schneider fails to teach, suggest or disclose the Applicant's invention, and, even when the proposed combination of Schneider with the additional reference of Haung is attempted, the Applicant's

invention is not taught, suggested or disclosed. Second, the Examiner contends that Schneider discloses a conveyorized horizontal processing line for wet processing work pieces comprising at least one respective transport member (rollers visible in the figures), extending in a horizontal direction of transport, at least one processing facility (bath 1), which forms one structural component (transport und fuhrungselemente – items 2) above the conveying bath. The Examiner acknowledges that Schneider does not disclose at least one adjusting device (motor 5) to raise and lower a structural component. The Examiner attempts to fill this deficiency with the additional reference, namely Huang. The Examiner contends that Huang discloses at least one adjusting device (slots 42 A and 42 B – referring to col. 4 lines, 48-57 of Huang) to raise and lower a structural component. The Examiner asserts that Huang discloses that these elements prevent jamming and therefore it would have been obvious to of have utilized such adjusting devices in order to prevent jamming of the substrate. In addition to the failure of Schneider to disclose or suggest the Applicant's invention, Applicant's invention is distinguishable over Huang and is not taught or suggested thereby. With respect to figure 2b, Huang explicitly explains that jamming of very thin PCB's may be prevented by the positioning apparatus (18) being curved both at the upstream end (36) and at the downstream end (38) of the bottom side thereof (col. 4, lines 35-47). Thus very thin PCB's which are forwarded towards the positioning apparatus and meanwhile treatment being flown against the bottom side thereof will travel to an upright direction and jam at the positioning apparatus. By curving the bottom sides of the positioning apparatus such jamming would be prevented because this would create guidance for the very thin PCB's.

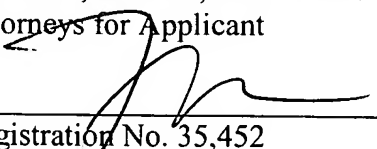
Another means to prevent jamming of very thin PCB's is the design of the ribs at the bottom side of the positioning apparatus. Further, in Huang at col. 4, lines 65, col. 5, line 10, the effect of the ribs slanting away from the axis II – II in fig. 2A such that any vigorously flapping leading edges and thus leading corners of very thin PCB's will not be jammed by the positioning apparatus because such a design insures that, even if the leading edge of the PCB's were to flap, the two leading corners will not be caught by the ribs. A reading of Huang therefore indicates that it is the curvature and the design of the ribs at the bottom side of the positioning apparatus which prevent jamming of very thin PCB's, and not the slots 42A, 42B shown in Fig. 2b of Huang. Therefore, it would not have been obvious to those skilled to one of ordinary skill in the art to use the adjusting device disclosed by Huang in the processing line of Schneider. For these reasons, Huang does not teach, suggest or disclose the Applicant's invention, even if the combination with Schneider were made, as proposed by the Examiner.

In addition, Huang does not disclose a structural component above the conveying path which comprises the transport member and processing facilities. For this additional reason Huang is also deficient of a teaching, suggestion or disclosure which would be combinable with Schneider to arrive at the Applicant's invention.

For the above reasons, applicant respectfully requests reconsideration and a withdrawal of the Examiners 103 rejection with respect to Schneider and Huang. Accordingly, claims 1-12 of the present invention should be patentable over the cited references and early allowance of the pending claims is earnestly solicited.

In the event an extension, or further extension, of time is required, one is respectfully requested, and the Commissioner is hereby authorized to charge the Applicant's undersigned representative's deposit account for any fees which may be required in connection with any extension or the filing of this amendment/response.

Respectfully submitted,
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